

UNITED STATES BANKRUPTCY COURT  
EASTERN DISTRICT OF NEW YORK

-----X Chapter 7

In re:

JULIAN SALIM,  
Debtor. Case: 13-42974(ESS)

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VW CREDIT, INC. Adv. Proceeding case: 13-01442

Plaintiffs,  
-against-

JULIAN SALIM,  
Defendant. SECOND  
**AMENDED ANSWER**

-----X  
JULIAM SALIM, by his attorneys GEORGE BASSIAS ATTORNEY LLC and PHILLIP JAFFE, ESQ, as for  
his answer to the complaint of VW CREDIT, INC. states the following.

1. Defendant JULIAN SALIM denies knowledge and information sufficient to form an opinion as to the allegations in plaintiff's complaint number 18, 21, 32, 33, 37, 38, 39, 42, 44, 45, 46, .
2. Defendant JULIAN SALIM denies the allegation in plaintiff's complaint numbered 17, 20, 23, 24, 25, 26, 34, 36, 41, 50, 51, 52, 53, 54, 57, 58, 59, 61 Defendant believed that any action taken by defendant was in good faith necessary and in the ordinary course of business.

FIRST AFFIRMATIVE DEFENSE

3. Defendant repeats, reiterates and realleges the answers numbered 1 through 2 as if the same were set forth herein at length.
4. Plaintiff's complaint fails to state a valid cause of action for denial of discharge upon which relief may be granted.

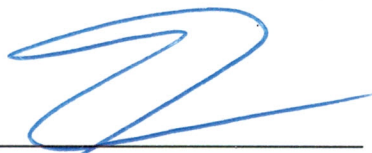
SECOND AFFIRMATIVE DEFENSE

5. Defendant repeats, reiterates and realleges the answers numbered 1 through 4 as if the same were set forth herein at length.
6. Defendant believes that plaintiff received all amounts owed by the trustee when the dealership was seized and sold.


THIRD AFFIRMATIVE DEFENSE

7. Defendant repeats, reiterates and realleges the answers numbered 1 through 6 as if the same were set forth herein at length.
8. Any actions taken by defendant individually and/or in a fiduciary capacity were taken in good faith and in the ordinary course of business.
9. Wherefore defendant asks for dismissal of this action and an award of attorney fees and costs, and whatever else the court deems proper.

Dated: Queens, NY  
October 17, 2013



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